



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm 206, PO Box 40908 \* Olympia, Washington 98504-0908 \* (360) 753-1111 \* Fax (360) 753-1112  
Toll Free 1-877-601-2828 \* E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) \* Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

**MEMORANDUM**

**TO:** Philip E. Stutzman, Director of Compliance

**FROM:** Vicki Rippie, Executive Director

**DATE:** February 12, 2009

**SUBJECT:** Complaint against Associated Casino Employees for Survival (ACES),  
and others, including its committee officers

**RCW 42.17.080 and 090** require political committees under the full reporting option to file timely, accurate reports of contributions and expenditures, including debts and obligations. Both monetary and in-kind contributions must be reported. Committees are required to report the name and address of each person who has made one or more contributions during the period that total, in the aggregate, more than \$25, together with the money value and date of such contributions and the aggregate value of all contributions received from each such person during the campaign.

**Summary:**

On September 1, 2005, Associated Casino Employees for Survival (ACES) filed a committee registration statement (PDC form C-1pc). The committee's stated purpose was to support a City of Tacoma initiative to eliminate a moratorium on mini-casinos. No election date was listed. The registration listed Cody Benson as campaign manager, Renee Tullis as treasurer, and Karen Owens and Elizabeth Johnson as co-chairs. The PACs 2005 effort was to gather signatures to place a measure on the ballot.

An amended C-1pc was received September 6, 2006. The date for the election was listed as September 19, 2006. It listed Mike Purdy as campaign manager, Renee Tullis as treasurer, and Elizabeth Johnson, as sponsor. The C-1pc listed the ballot proposition as City of Tacoma Initiative Measure 1.

ACES filed C-3 reports (Cash Receipts Monetary Contributions) and C-4 reports (Campaign Summary Receipts and Expenditures). The first report was filed December 20, 2005 and the last report was filed October 18, 2006. The reports indicate that monetary contributions were \$31,695.00, in-kind contributions totaled \$38,237.90, and monetary expenditures were \$31,218.47, resulting in total contributions of \$69,932.90 and total expenditures of \$69,456.37.



A review of statements from Mike Purdy and others associated with the ACES campaign, as well as statements from vendors, indicate that all debts and obligations of ACES, as well as all contributions, both monetary and in-kind, supporting the ACES campaign, may not have been reported. For example, information reviewed indicates that the following debts and obligations and in-kind contributions may not have been reported by the ACES campaign:

**Debts and Obligations**

- Labor Ready \$17,755.22
- Copy It-Mail It \$ 6,783.07
- Cody Benson \$ 8,000.00

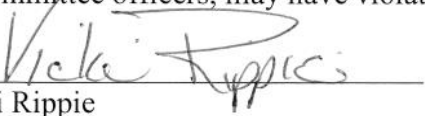
**In-Kind Contributions**

- Tom Dooley's time and expertise donated to ACES campaign
- Mike Purdy's time and expertise donated to ACES campaign
- Tim Iszley's time and expertise donated to ACES campaign
- Payments to employees of casinos to conduct door-belling activities

**Alleged Violations:**

The facts referenced above provide reason to believe that Associated Casino Employees for Survival (ACES), and others, including its committee officers, may have violated RCW 42.17.080 and .090 by not reporting all contributions, both monetary and in-kind, and debts and obligations, supporting City of Tacoma Initiative Measure 1.

Based on this information, I am filing this complaint and directing staff to investigate the allegation that Associated Casino Employees for Survival (ACES), and others, including its committee officers, may have violated chapter RCW 42.17.

  
Vicki Rippie  
Executive Director

  
Date